

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No.: 2013-275-WS

In the Matter of Application of	)	
	)	
Carolina Water Service, Inc.	)	CAROLINA WATER SERVICE'S
for Adjustment of Rates and Charges and	)	MOTION TO STRIKE
Modifications to Certain Terms and	)	DIRECT TESTIMONY OF
Conditions for the Provision of Water	)	LESLIE HENDRIX
and Sewer Service	)	

Carolina Water Service, Inc. ("CWS") hereby moves to strike the following portions of the direct testimony of Leslie Hendrix, prefiled by the Forty Love Point Homeowners Association ("the HOA"): page 1, l. 15 to page 4, line 3. This motion is made on the grounds that Ms. Hendrix's testimony is not relevant and should be excluded from the record.

The testimony which is subject to this objection pertains to: 1) the type of water service at Ms. Hendrix's house, 2) Ms. Hendrix's water bills, 3) calculation of water charges for Ms. Hendrix and residents of the Dutchman's Shores neighborhood, 4) Ms. Hendrix's complaints regarding her service, and 5) Ms. Hendrix's knowledge (or, more accurately, the lack thereof) of CWS and UI's employees in South Carolina.

Ms. Hendrix's testimony regarding each of these topics is irrelevant, because Ms. Hendrix is not a customer of CWS, and the facts that she relates do not pertain to CWS or the pending application. An affidavit from Karen Sasic, Utilities, Inc.'s Director of Billing and Regulatory Relations for Utilities, Inc., accompanies this motion and establishes that Ms. Hendrix is not a customer of CWS. Ms. Hendrix is, instead, a customer of another Utilities, Inc. subsidiary Utilities Services of South Carolina, Inc. ("USSC"). As a customer of USSC Ms. Hendrix's bills are

calculated at a different rate and subject to a different tariff. Service to Ms. Hendrix's subdivision, Dutchman's Shores, do not generate revenue for CWS, nor do expenses of capital improvements made for Dutchman's Shores, or any part of the USSC system, have an impact on CWS's case. Therefore, Ms. Hendrix's testimony as to the issues subject to this motion do not pertain to facts that are of consequence to the determination of this action, and should be excluded pursuant to South Carolina Rules of Evidence, Rules 401, 402, and 403.

Finally, CWS reserves the right to make additional objections and motions to Ms. Hendrix's testimony when it is introduced at the hearing, including but not limited to her credentials as an expert witness.

Respectfully submitted,

**TERRENI**  
LAW FIRM, LLC

Digitally signed by Charles L.A. Terreni  
DN: cn=Charles L.A. Terreni, o=Terreni Law  
Firm, LLC, ou,  
email=charles.terreni@terrenilaw.com, c=US  
Date: 2013.12.13 16:36:38 -05'00'

Columbia, South Carolina  
December 13, 2013

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BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No.: 2013-275-WS

In the Matter of Application of	)	
	)	
Carolina Water Service, Inc.	)	AFFIDAVIT OF KAREN SASIC
for Adjustment of Rates and Charges and	)	MOTION TO STRIKE
Modifications to Certain Terms and	)	DIRECT TESTIMONY OF
Conditions for the Provision of Water	)	LESLIE HENDRIX
and Sewer Service	)	

The Affiant, after having been first duly sworn, deposes and states as follows:

1. I, Karen Sasic, am employed by Utilities, Inc., parent company of Carolina Water Service of South Carolina as its Director of Billing and Regulatory Relations for Utilities, Inc.
2. My office is located at 200 Weathersfield Avenue, Altamonte Springs, FL 32714.
3. I have examined Carolina Water Service's customer service records for the period since 2004 to the present and Carolina Water Service does not have and did not have a customer named Leslie Hendrix, during that time period.
4. During that time period, Ms. Hendrix was a customer of Utilities Services of South Carolina, a different subsidiary of Utilities, Inc.

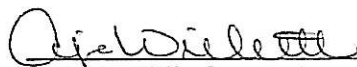
Further, Affiant sayeth not.



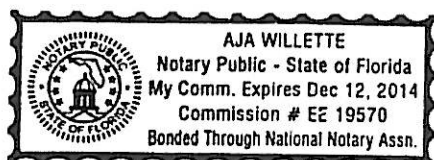
COUNTY: Pinellas County

Sworn and subscribed to me

This day of 12/11, 2013, WAS Karen Lee SASIC, who presented Florida State Drivers License & s identification.



Notary Public for State of Florida  
My Commission Expires 12-12-2014



### CERTIFICATE OF SERVICE

The undersigned, Charles L. A. Terreni, of Terreni Law Firm, LLC, does hereby certify that he has this date served the below-listed parties with a copy of the pleading(s) indicated below by sending a copy of the document(s) to each of them by electronic mailing:

RE: *Application of Carolina Water Service, Inc. for adjustment of rates and charges and modification of certain terms and conditions for the provision of water and sewer service*  
Docket Number: 2013-275-WS

PARTIES SERVED: Jeffrey M. Nelson, Esquire  
Florence P. Belser, Esquire  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201

Laura P. Valtorta, Esquire  
903 Calhoun Street  
Columbia, SC 29201.

PLEADING: Carolina Water Service's Motion to Strike Direct  
Testimony of Leslie Hendrix, with attached Affidavit  
of Karen Sasic

DATE: December 13, 2013



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